

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Superior Barrel and Drum - Removal Polrep



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region II**

**Subject:** **POLREP #5**  
**Removal Action continues with focus on HazCat**  
**Superior Barrel and Drum**

**Elk, NJ**  
**Latitude: 39.6930670 Longitude: -75.1345550**

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**From:** Keith Glenn, OSC/Environmental Scientist

**Date:** 10/6/2013

**Reporting Period:** September 30, 2013 through October 7, 2013

**1. Introduction**

## 1.1 Background

<b>Site Number:</b>	A23K	<b>Contract Number:</b>	EP-S2-10-01
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	8/30/2013	<b>Start Date:</b>	9/27/2013
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NJD986630705	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	8/29/2013
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

### 1.1.1 Incident Category

A Removal Action is required to identify remaining hazardous materials that are on-Site and properly contain and dispose of such.

### 1.1.2 Site Description

On August 29, 2013 the New Jersey Department of Environmental Protection (NJDEP) notified the United States Environmental Protection Agency (EPA) Region 2 Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site. NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Observed were thousands of containers, mostly 275-gallon totes and 55-gallon drums, located along a public road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in various locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, however most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, oxidizer, and non-hazardous material.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

#### 1.1.2.1 Location

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5 acre property. The entrance to the facility is down a dirt road. The north end of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested property. To the South are private lands which are also densely wooded with several marshy areas. The Western boundary is indicated by Rt. 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Lane, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is where the permanent steel structure is located. This area would receive containers, rinse the containers, and recondition them for future market. This area is approximately 2.4 acres with containers located throughout. The additional operational area appears to be mainly for storage of full 275-gallon totes and 55-gallon drums, with several trailers holding containers. This area encompasses approximately .32 acres of land. Both areas show signs of impact

from leaking containers or dumping of materials.

#### **1.1.2.2 Description of Threat**

The facility is located in a federally recognized wetland. Thousands of containers are in various conditions of deterioration and leaking containers have been noted. Many labels on containers indicate contents of hazardous substances, however the property owner and his attorney have stated that the drums are of unknown contents. The facility is unsecured with access from a public road and surrounding trails. Shot-gun shells from target practice on containers are evidence of trespassers, along with signs of vandalism.

Companies that are located in the immediate area, along Jacob Harris Lane, are on private water wells. Residential properties located along Whig Road (<1/4 mile away) and Aurora Road (<1/2 mile) are also on private well water.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

NJDEP collected samples from four (4) random containers, all 55-gallon drums. Field screening tests were conducted on them using Photoionization Detectors, HazMat ID, pH, flash point, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers.

A Removal Assessment was completed on September 27, 2013. Approximately 252 containers were opened and aliquots collected for HazCat. Field laboratory results indicated the presence of hazardous characteristics. Samples were collected from select drums and totes where they were shipped to NELAC accredited laboratories. Analytical results showed toluene, benzene, TCE, PCBs, lead, and many other hazardous substances make up the contents of the containers. Soil samples also showed attribution between the materials in the containers and that in the soil.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

Activities at the Superior Barrel and Drum Site continued during the operational period. Following the issuance of an Administrative Warrant for EPA to initiate a removal action, alterations of the work zones were conducted. An increase in ERRS personnel has aided in the expedited collection of HazCat aliquots. Field analysis of materials through the hazardous categorization technique continued to be the focus of operations. Preliminary analytical results continued to indicate the presence of CERCLA hazardous substances. Validated data results started to be received, also showing that listed hazardous substances are in on-Site containers and surface soils.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office, HazMat Team, NJDEP, U.S. Fish and Wildlife, and local officials. Twenty-four hour Site security continued to be maintained with the aid of a security firm.

#### **2.1.2 Response Actions to Date**

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

From September 30, 2013 through October 6, 2013 EPA redesigned the work zones in anticipation of an increase in personnel. The personnel decontamination station was enlarged to accommodate more equipment and better house cleaning stations. A dedicated Staging Area Manager was designated to facilitate the filling of air bottles, aid in the donning and doffing of PPE, maintain order the contamination reduction zone, and act as primary backup for Level B personnel. The parking area was expanded so an office trailer and storage units could be brought in.

Engineering controls were installed around drums and totes located in Areas 2 and 3. Additional contingencies were established should a catastrophic release or significant rain event occur. These controls will prevent any runoff of contaminants or impacts to neighboring properties. Additional contingencies were formulated in the event a container malfunction and release of its contents.

The transition from a removal assessment to a removal action altered operational responsibilities of contractors. RST personnel will manage all data from analytical laboratories, maintain all perimeter air monitoring activities, manage handheld air monitoring equipment, maintain Scribe and DrumTrak databases, and aid in the collection of confirmatory samples. ERRS responsibilities include the movement of containers, opening and assessing containers, collecting the aliquot, and performing the field HazCat testing.

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

During the inventorying of containers, numerous totes were found with other company names. These totes had non-hazardous labels and indicated the contents to be residual waste. Companies listed include Container Recyclers of Camden, SRS Bro LLC of Camden, IRS Inc of Camden, Jefferson Property Partners of Camden, Fogel & Sons, and others. All of these facilities appear to be related. IRS and Container Recyclers of Camden is the same company located on Jefferson Street in Camden. The principle president and listed managers are members of the Fogel family. Additional drum labels include Valspar, fruit juice concentrate, racing fuel companies, BASF, foreign countries and more.

EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. Files have been located onsite and the enforcement officer has reviewed such files for additional PRPs.

### 2.1.4 Progress Metrics

	Number of Aliquots for HazCat Collected <sup>1</sup>	Number of Confirmatory Samples*	Number of Surface Soil Samples*	Number of Surface Water Samples*
Cumulative Total	357	79	36	4

<sup>1</sup>Several containers were opened but aliquot and sample collection was not possible. This count does not include those containers.\*Does not include duplicate samples or MS/MSDs for QA/QC.

Haz Class	Acid	Neutral	Potential Oil	Flammable	Oxidizer	Base	Chlorinated	HazCat Complete
Cumulative Total	14	128	60	60	26	9	4	312

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County, and local officials will continue throughout the removal activities of the Superior Barrel and Drum Site. During the next operational period, routine activities will continue. ERRS will continue to move and manage containers located on-Site. Personnel, utilizing Level B PPE, will continue to assess containers and collect aliquots of materials for field testing. RST personnel will continue to manage perimeter air monitoring equipment.

#### 2.2.1.1 Planned Response Activities

The short term goals of the project focus on the HazCat of all containers located on-Site. An

understanding of all container composition is necessary prior to proceeding with consolidation and removal of materials. Data management will continue to remain an integral part of operations to maintain organization of field data, analytical data, container identification, and HazCat progress.

### 2.2.2 Issues

On October 1, 2013 the federal government shutdown due to a lack of appropriations. As such, most support personnel, including other OSCs, public information officers, laboratory support staff, and others have been furloughed. The OSCs in the field have been getting numerous press inquiries and on October 4<sup>th</sup> a news crew from CBS 3 Philadelphia came to the Site. Although protocol indicates all press inquiries need to be sent to [press@epa.gov](mailto:press@epa.gov), this has proven insufficient since the email address is not being monitored or responsive. An increase in coverage is expected during the next operational period.

## 2.3 Logistics Section

All logistical issues are being handled by EPA Region 2, the RST contract, or ERRS personnel.

## 2.4 Finance Section

### 2.4.1 Narrative

On September 4, 2013 \$250,000 has been given to the Kemron ERRS contract to perform an emergency removal assessment.

By September 27, 2013 \$600,000 was verbally authorized for the commencement of a Removal Action. The Action Memo is forthcoming.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Assessment	\$250,000.00	\$71,400.00	\$178,600.00	71.44%
ERRS - Removal Action	\$600,000.00	\$0.00	\$600,000.00	100.00%
TAT/START	\$0.00	\$5,354.00	(\$5,354.00)	0.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$850,000.00</b>	<b>\$76,754.00</b>	<b>\$773,246.00</b>	<b>90.97%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Safety Officers have been identified through RST and ERRS. Health and Safety Plans have been completed by each contractor. Daily tailgate briefings are conducted. On October 4, 2013 safety demonstrations reviewed emergency evacuation procedures.

### 2.5.2 Liaison Officer

The OSC is acting Liaison Officer with local, State, and County officials. Additional meetings with government officials have been established and the OSC plans on meeting with the Mayor of Elk

Township.

### **2.5.3 Information Officer**

Sophia Kelley has been designated as the Community Involvement Coordinator for the Superior Barrel and Drum Site. Ms. Kelley can be reached at 212-637-3670. Elias Rodriguez is the press coordinator and can be reached at 212-637-3664. Christopher Sebastian is the inter-governmental liaison and can be reached at 212-637-3597. George Zachos is the Regional Public Liaison and can be reached at 1-888-BUDSMAN.

During the government shutdown all public information officers will be on furlough. All questions from the press should be directed to [press@epa.gov](mailto:press@epa.gov).

On October 4, 2013 CBS 3 Philadelphia visited the Site and requested an interview due to a lack of response from [press@epa.gov](mailto:press@epa.gov). <http://philadelphia.cbslocal.com/2013/10/04/exclusive-epa-investigates-hazmat-concerns-in-south-jersey/>

## **3. Participating Entities**

### **3.1 Unified Command**

Unified Command is currently not being used.

### **3.2 Cooperating Agencies**

EPA is coordinating efforts with various entities that have proven to be extremely helpful in the success of this project, including but not limited to:

NJDEP

Gloucester County HazMat, Dept. Emergency Response

Gloucester Fire Marshal and Fire Department

Police Department

Glassboro Water Department

## **4. Personnel On Site**

EPA (2)

RST Contractors, Weston Solutions (1)

ERRS Contractors, Kemron (12)

NJDEP (1)

Fire Department and HazMat (2)

## **5. Definition of Terms**

### **Definition of Terms**

Assisting and Cooperating Agencies - Agencies who are assisting the EPA response, but are not a part of Unified Command.

E Goods - Electronic machines which contain hazardous components. Emergency Response - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

FRP - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil. Required by certain facilities that store and use large quantities of oil.

Household Hazardous Waste - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

Hazardous Debris - Debris which contains compounds that make it inappropriate for municipal landfill disposal

Monitoring - Using equipment which will give limited real-time information about constituents in environmental media. This method is used most often for air and water testing.

RCRA - Resource Conservation and Recovery Act.

RMP- Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

Sampling -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

Small Container - any container with a potential capacity of less than 5 gallons.

TRI - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

Unified Command - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional responsibilities.

White Goods - Large home electronics such as refrigerators, washing machines, and dryers.

WW - Wastewater Treatment Facilities

## **6. Additional sources of information**

### **6.1 Internet location of additional information/report**

[www.epaossc.org/SuperiorBarrelAndDrum](http://www.epaossc.org/SuperiorBarrelAndDrum)

### **6.2 Reporting Schedule**

At a minimum, POLREPS will be generated on a weekly basis. Should emerging situations need to be provided to parties, spot reports or bulletins will be sent via email.

As of September 26, 2013 daily updates will no longer be provided.

## **7. Situational Reference Materials**

[www.epaossc.org/SuperiorBarrelAndDrum](http://www.epaossc.org/SuperiorBarrelAndDrum)